1   they price, package, promote, market their services.

2   Q   RNS displays billing record information,

3   correct?

4   A   Billing record information?

5   Q   Yes.

6   A   Yes.

7   Q   And RNS displays the rate for the service and

8   calculates the taxes for that service; isn't that also

9   correct?

10   A   That's correct.

11   Q   Now, this functionality isn't currently

12   available for ALECs today; is it?

13   A   It is not part of -- it's not part of the EDI

14   ordering interface. Again, pricing, promotion,

15   packaging, how a CLEC offers its services to its

16   customers is not something over which BellSouth has any

17   control. It's at the discretion of the CLEC. And a

18   CLEC can choose, using the industry standard ordering

19   method, to organize information on its side of the

20   interface in whatever way suits its pricing or marketing

21   objectives.

22   Q   Ms. Calhoun, in RNS can a BellSouth service

23   representative see all the NXXs associated with valid

24   addresses?

25   A   Yes. I found that answer at lunchtime, and it

1 is possible for them to do that, and they would access

2 that information through the telephone number selection

3 screen.

4   Q   I don't think you need to refer to this, but

5 if you do I'll stop after I ask the question.   In

6 Late-filed Exhibit No. 2 you provide average talk times

7 for BellSouth service representatives.

8   Are these average intervals based on service

9 representatives using RNS?   That's going to be your

10 Late-filed Exhibit No. 2 and that's part of what has

11 been identified as Exhibit No. 43.   And you can find

12 that on Page 381.

13   A   This includes business and residential.   So it

14 will include both RNS and DOE.

15   Q   One last question.   Why did BellSouth create

16 separate databases for ALECs instead of allowing ALECs

17 direct access to the same databases that BellSouth uses

18 for its retail services, retail operations?

19   A   Well, there are a couple different reasons for

20 that.   One is, of course, as I've talked about at

21 length, the industry recommends EDI for ordering, and so

22 BellSouth made available an EDI ordering interface, but

23 another reason is that BellSouth has an RNS system for

24 residence customers, and a DOE system for business

25 customers in four states, and a SONGS system for

ATTACHMENT 8

**MCI Telecommunications
Corporation**

MCI 780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

August 18, 1997

Ms. Ilene Barnett
Sales Director
BellSouth Interconnection Services
1960 West Exchange Place
Tucker, GA 30084

Dear Ms. Barnett:

This letter is in response to Cathy Forbes' June 26 letter, which replied to Helen Arthur's June 16, 1997 inquiry in reference to the following section in the MCImetro-BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 Street Address Guide (SAG)

> 2.1.3.1   Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made.
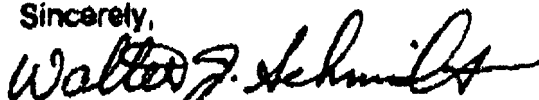
This section clearly requires BellSouth to provide to MCIm in electronic form either the SAG data or its equivalent. As it is more than thirty (30) days since the interconnection agreements became effective in Georgia, Florida, Tennessee, and North Carolina, BellSouth is overdue in providing to MCIm in electronic form the SAG data.

Ms. Forbes letter states, and I quote, " Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access". MCIm is capable of accepting an electronic download of this data via NDM until a regular mechanized daily batch process can be implemented to accommodate daily updates.

MCIm insists that BellSouth comply with the terms of its interconnection agreements with MCIm and provide MCIm in electronic form with the SAG data no later than August 29, 1997. Failure to do so will significantly hamper MCIm's entry into the local market by forcing MCIm to continue to contend with manual intervention in the pre-ordering/ordering process to verify customer street address information, and, will demonstrate BellSouth's continued lack of compliance with the contracts.

Please reply to this letter no later than August 22, 1997.

Sincerely,

Walter J. Schmidt

Walter J. Schmidt

cc: Marcel Henry - MCI
    Charlene Keys - MCI
    Bryan Green - MCI
    Jeremy Marcus - MCI
    Joe Baker - BellSouth
    Pam Lee - BellSouth

ATTACHMENT 9

ⓐ *BELLSOUTH*

BellSouth Telecommunications, Inc.
Room 34S31 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

June 26, 1997

Ms. Helen Arthur
MCI Telecommunications Corporation
Suite 500
780 Johnson Ferry Road
Atlanta, Georgia 30342

RE: MCIm/BellSouth-GA Interconnection Agreement - Attach VIII, Sect 2.1.3

Dear Ms. Arthur:

This letter is in response to your inquiry of June 16, 1997 in reference to the following
stipulation in the MCIm/BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 .1 Street Address Guide (SAG)

> Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall
> provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the
> SAG shall be made available to MCIm on the same day as the change to the data is made.

Your interpretation of the above stipulation is that BellSouth will provide the Street Address
Data, not online access, to MCIm . However, the stipulation states that BellSouth is to provide
the SAG data to MCI or its equivalent in electronic form. Since, BellSouth is unable to provide
the initial SAG data and daily updates in batch form the only available equivalent would be using
online access.

Sincerely,

Cathy Forbes
Compliance Manager
Interconnection Services

cc: Ilene Barnett

ATTACHMENT 10

@ **BELLSOUTH**

BellSouth Interconnection Services   770 492-7500   MCI Account Team
Suite 420 .   Fax 770 621-0622
1060 West Exchange Place
Tucker, Georgia 30084

August 20, 1997

Mr. Walter J. Schmidt
MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, Georgia 30342

Dear Wally,

This is in response to Bryan Green's verbal request to provide MCIm with a copy
of BellSouth's Regional Street Address Guide (RSAG) database files and RSAG
record layouts and to your letter dated August 18, 1997, regarding the same
subject. In accordance with the MCIm/BST Interconnection Agreement, MCIm can
access BellSouth's RSAG database through the Local Exchange Navigation System
(LENS) and/or via Interexchange Carrier Reference Validation (ICREF) service.

The RSAG database files are extremely voluminous for downloading and the fact is
that the database changes so rapidly it would be outdated by the time MCIm
would be in receipt of the database files. The RSAG technical specifications are
proprietary. .

MCIm may pursue receipt of the RSAG database files in a form other than that
described in the Interconnection Agreement through the Agreement's Bona Fide
Request (BFR) process. I trust that the above provides you with the desired
information.

Sincerely,

Pam Lee
Sales Assistant Vice President

cc: Joe Baker - BST
     Marcel Henry- MCI
     Charlene Keys - MCI
     Bryan Green - MCI
     Jeremy Marcus - MCI

ATTACHMENT 11

ⓐ *BELL*SOUTH

BellSouth Interconnection Services   **Memorandum**

File Code   000 000 000
Date   May 20, 1997

To   Bryan Green
Telephone number   404-267-5515
Fax number

From   Ilene Barnett
Telephone number   770-492-7525
Fax number

Subject   Customer Record Bill Screen

Attached is a list detailing the major fields on a Customer Record Information System (CRIS) Bill screen and the BellSouth CLEC Access to Records Proposal. This information was furnished to me by Jim Childress.

Our conference call will be Tuesday, May 20, 3:00 p.m. EDT - 4:00 p.m. The conference bridge number is 205-970-3742, access code 4675.

Please call me if you have any questions or comments.

Jim C.
(404) 420.0031 - Fax
404 529.6191 - OPC

Memorandum
Page 2

Customer Record Information System (CRIS) Bill Screen

N 1. Account number including area code and customer code.

u 2. Screen Name

u3. Date of the Bill (Bill cycle)

u4. Status of Account. (live or final)

u5. Account Status Indicator

u6. Four digit abbreviation for the exchange (Calling Exchange)

N7. Class of Service

u8. Rate Group Identification

N9. Billing Name and Address

P10. Pay By Date - Date bill is considered past due

P11. Start Treatment Amount - Amount of money a customer must owe before treatment action is appropriate.

u 12. Four digit code indicating the federal, state, local, etc. tax states of the account.

P13. Credit Classification

P14. Months in Credit Class - This is the umber of months that an account has been in its present credit class

u15. RAO number (the first 3 numbers) for the customer's account as well as the customer's check digit (the last number).

P16. Refer Account Date - Date notice is mailed to a customer when a treatable amount is due

P17. Remove from Treatment Amount - The dollar amount an account must be reduced below to no longer be considered treatable.

u18. Taxing Area Code - Indicates the city, county, franchise, or surcharge tax rat on an account

N19. Toll Billing Exception - This code represents a restriction from certain types of calls (Should show up under prod & SVC

N20. Primary Interexchange Carrier Code

P 21. Date of Installation - Date svc installed

P22. Refer to Business Office - The date a referral is sent to the Collection Center/Account Center on a treatable amount

23. No Treatment - An indicator to stop computerized treatment of an account.

24. Toll Credit Limit

25. Deposit - An amount of money obtained to secure an account.

P. 26. Write Off Date

U27. Preferred Payment Date

P 28. Calling Card Holder - indicator that they have a calling card.

Memorandum
Page 3

Customer Record Information System (CRIS) Bill Screen

29. Amount Due - The current amount due on the account.
30. Old Telephone Number/New Telephone Number
31. Credit Information
32. Credit Information Verified
33. Bill Summary
34. Features - A code indicating the available central office services in a customer's area to which the customer does NOT subscribe
35. Itemized Calls - The total dollar amount of toll charges from all entities which appeared on each of the three preceding bills.
36. Treatment History (12 months)
37. Return Check History (12 months)
38. Social Security Number
39. Unregulated Billing
40. Last Bill - The amount of the last bill
41. Payments and Adjustments posted since the last bill
42. Transfer - Amount of money transferred from another account with the telephone number indicating where the balance originated.
43. Balance - Balance after last bill plus/minus any payments and adjustments
44. Late Payment Charge
45. Current month's total charges for charges incurred since last month's bill
46. Total of current charges and any unpaid charges from previous bills.
47. BellSouth Charges
48. Interexchange Charges
49. Payments and Adjustments Through Bill
50. Payments and adjustments posted during the current billing cycle
51. Memo Screen for making customer notations

BellSouth Interconnection Services   Memorandum

Date	July 2, 1997
To	Joe Baker
cc:	Scott Schaefer
	Pam Lee
	Kathy Wilson-Chu
	Ilene Barnett
	Bob Siegel
	Linda Tate
	File

From	Randy Kinkaid
Telephone Number	404-927-7530
Fax Number	404-529-7074
Subject	Response to MCI's OSS Issues

The attached addresses the OSS Interface issues raised by MCI's Bryan Green in his 6/29 memo.

This should provide the immediate feedback Bryan needs with hopes of getting into more detail or further discussions at a later time.

Please call me with any questions or concerns.

Response to MCI's OSS Issues

BST Position on TCP/IP SSL3
SSL3 adds encryption to the TCP/IP layer. SSL3 is not a national standard, nor have the standards bodies made SSL3 a "recommendation." SSL3 is under consideration as a national standard after winning out over EC-Lite. It currently resides with the Local Ordering Sub-Committee of ECIC for recommendation.

IF SSL3 becomes the national standard, BellSouth will develop the pre-ordering system to meet this standard, if CLECs request the development.

UNE OSS support
BST will support electronic ordering via EDI of Loop, Port, INP (interim number portability)and Loop with INP by the end of July, and via LENS in September. Loop and port combinations will follow (for Kentucky, only).

Electronic Bonding for maintenance
BellSouth has agreed to develop electronic bonding for maintenance and repair in several CLEC contracts. The electronic bonding gateway for EC TA will be ready during November.

Electronic access to CSR
Electronic access to customer service records is currently available to CLECs via the LENS interface. CLECs must have a CSR letter of authorization on file with BST to obtain access.

Customer record access is a pre-order function not an ordering function, and as a result, the customer record will not be available via EDI. LSI will not be used because this does not provide the CLEC enough data for certain order types.

LENS Issues
The LENS users guide contains sufficient information on the LENS specification for a CLEC to connect to and use LENS. Internet Explorer is supported by LENS, and the help desk/SPOC is operational.

Pre-order functionality
ICREF was part of the interim solutions previous to LENS.

LENS queries DSAP for due date information.

EDI Documentation
EDI documentation is contained in the two volumes of the Local Exchange Ordering Guide that has been provided to MCI. Updates and information will accompany notification of major releases, and new guides will be shipped to all those who have received the guide and are in BST's database.

Role of LESOG
Local Exchange Service Order Generator's (LESOG) role is to mechanically generate service orders. LESOG is a system that pulls orders from the Local Exchange Ordering (LEO) database, and selects those orders that can be processed electronically, and sends those orders downstream.

CRIS DATA ELEMENTS NOT PROVIDED TO CLECS-

*Social Security Number
  BellSouth does not pass an end user's SSN. This is not shared because of the expectation of the end
  user that it is not shared with outside parties (end user privacy issue).

*Credit Information
  BellSouth does not share this information because of the Credit Reporting Act. BellSouth chooses not to
  provide information that would classify BellSouth as a Credit Reporting Agency (Credit Bureau).

*Payment History (except where mandated by state PSC)
  Credit Reporting Agency (same as above)

*Credit Class
  Credit Reporting Agency (same as above)

*BellSouth Visa Information Or Other Credit Options
  Credit Reporting Agency (same as above)

*Order Activity Information
  This information does not provide anything specific or helpful. It only provides the previous service
  order numbers with due date that completed within the last month. It does not indicate what activity the
  service order completed.

*Bill Section Concession Codes
  Concession codes do not provide value to a CLEC. This is a BellSouth internal code only.
  The concession codes in the S&E will be sent because there is no way to suppress them.

*Bill Section Tax Codes
  Tax Codes do not provide value to a CLEC.

*Bill Section BTN
  BTN information does not provide value to a CLEC.

*Installment and Deferred Payment Plans
  Credit Reporting Agency (same as above)

*Itemized Toll Charges
  This data element is not a part of the CSR at all. To deliver this data element additional development
  would be required to get this data element from the CRIS Bills Database records.

****
The Billing name and address (including BN1, BN2, BN3, BA2, BA3, BA4, PO) is the only information
provided from the bill section of the CSR.

PIC and all related codes were previously listed as an exclusion, but it has been decided that this
information can be provided.

CPNI accounts will not be furnished via on-line system. The customer has elected to restrict access to his
CSR. The CLEC must contact the LCSC and furnish a Letter of Agency to obtain the CSR.

A CLEC may not access a CSR belonging to another CLEC. This information is not BellSouth's
information to share.

ATTACHMENT 12

NORTH CAROLINA UTILITIES COMMISSION

TRANSCRIPT OF TESTIMONY

BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth's In-Region InterLATA Service Pursuant
to Section 271 of the Telecommunications Act of 1996

DOCKET NO. ___P-55, Sub 1022___

VOLUME 7

September 25, 1997

DATE _____

1   getting preordering information, and it is, but not to

2   the exclusion of the firm order mode. You can get

3   preordering information either way.

4   Q.   And when the hold function is employed in RNS, how

5   long is that number -- how long is the number associated

6   with that order held?

7   A.   I believe it's thirty (30) days.

8   Q.   All right.

9   Again, looking back to the RNS DOE demo

10   yesterday, assume you've got a customer -- new customer,

11   new address, says I need four lines. I want one main

12   number. I want a number for the kids. I want a number

13   for the fax machine, and I want a number for the

14   InterNet.

15   Is there information available to the

16   BellSouth customer service representative to know

17   whether facilities are available to provide four lines

18   to that customer without requiring a premises visit?

19   A.   No.

20   Q.   It is not available through any of the systems

21   available to the BellSouth representative?

22   A.   No, they can't see the number of facilities that

23   are available.

24   Q.   If you would turn to the -- the summary of your

1 through EDI?

2 A.   Yes.

3 Q.   And is that list what you sometimes call simple

4 resold services?

5 A.   I don't know if I used that term.

6 Q   All right.   Can we use it today just so when I say

7 simple resold services we'll be talking about the -- the

8 thirty (30) items on exhibit nineteen (19)?

9 A.   Okay.

10 Q.   All right. Is it true that when an order for one

11 of these thirty (30) simple services is placed through

12 EDI that the Order flows through the downstream systems

13 of LEO, LESOG, SOCS, I believe that we saw on one of

14 your exhibits yesterday, and results in a mechanically

15 generated order at the end of the process?

16 A.   Yes, that's -- if -- if you look at the heading on

17 this particular exhibit, this is a list of services

18 available with mechanized order generation, that means

19 all the way through.

20 Q.   All right. And there are -- is there any

21 situation in which a properly formatted correct order

22 for one of these thirty (30) services would fall out of

23 the system and not generate a mechanized order?

24 A.   I'm not aware of any exceptions.

NORTH CAROLINA UTILITIES COMMISSION

1   It is not a new installation, not a new

2 customer, but simply a migration of an existing

3 customer, a customer who has twenty (20) DID trunks from

4 BellSouth today, and says, I would like to become a

5 customer of the CLP, essentially a change as is, is that

6 required to go through this account team complex order

7 process that you have described?

8 A. Yes, and something similar would happen for a

9 BellSouth retail customer, if one company were buying

10 another company, for example, and an account team -- if

11 one company that had complex services was buying -- was

12 being bought by another company, and account team would

13 make sure that all of that activity was handled

14 properly, because when you got into complex services,

15 you're dealing with complicated account structures,

16 maybe multiple layers of billing, and it requires

17 someone with some expertise and knowledge of the account

18 to actually be involved in that process.

19 Q. And I understand if we were dealing with State

20 Government that there might be several layers of billing

21 and quite a complex arrangement, but would you expect

22 that type of complexity with the twenty (20) DID trunks

23 that I have described?

24 A. It could be.

1 Q.   Is it also possible it could not be?

2 A.   I think that any time you get into something that

3 involves DID, the likelihood that there are going to be

4 other complicating factors on the account is very high.

5 Q.   Let me turn back just for a minute to RNS and DOE,

6 and ask you do all orders entered through RNS, if they

7 are properly formatted and correctly entered, do they

8 flow through BellSouth's downstream systems, and result

9 at the end in the generation of mechanical order --

10 mechanized generation of a order?

11 A.   Anything that is ordered through RNS, that's

12 correct, but as we said yesterday, there are some things

13 that you can't necessarily order through RNS, so that

14 doesn't categorically apply to all residence services.

15 Q.   Okay. Well, I'm going to talk about DOE because

16 anything you can't order -- let me ask this way.

17   Anything you can order -- anything that can be

18 ordered from BellSouth, or anything that BellSouth can

19 provide can be ordered through DOE, is that correct?

20 A.   Yes.

21 Q.   Okay. It's sort of like you're the carrier of

22 last resort. It's the order entry system of last

23 resort?

24 A.   Yes, more or less.

1   If there were an invalid address that would

2 come back to the LCSC for some sort of resolution?

3 A.   Yes.

4 Q.   If there was a PIC code that presubscribed

5 interexchange carrier code that was an invalid code,

6 that would come back to the LCSC?

7 A.   Yes.

8 Q.   If a telephone number had been entered -- miskeyed

9 on the order and you were trying to place an order for a

10 new installation and it was a working telephone number,

11 that would come back to the LCSC?

12 A.   Yes.

13 Q.   Is there a way to describe generally which types

14 of rejects that come to the LCSC are corrected by the

15 LCSC, and which types of rejects are funneled back to

16 the CLP for further handling by it?

17 A.   I guess the -- I don't know that there is a term

18 of art for it, but obvious errors -- I mean, ones that

19 the LCSC could recognize simply by looking at the Order

20 and understanding that the CLP had failed to validate

21 the address using the address validation tool, for

22 example, would be corrected by the LCSC.

23   I mean, they can see what's wrong with the

24 order. If -- if it's something that requires the -- the

NORTH CAROLINA UTILITIES COMMISSION

1   CLP to clarify, or then -- then they'd have to send it

2   back to the CLP. I mean, there is just not a term of

3   art to describe it I don't think.

4   Q.   Okay. Fair enough.

5   In the case of a BellSouth order that has been

6   placed into the system through RNS or DOE, those orders

7   don't go to LEO and LESOG, do they?

8   A.   No, they don't. In RNS there are analogous

9   systems.

10 Q.   And I'm not going to ask you to name them because

11 the names are just going to confuse me more because I

12 never could figure out what they stood for, but there --

13 it goes through several systems and they all do end up

14 at SOCS at the end of the day?

15 A.   Right.

16 Q.   If a BellSouth order gets rejected by any of those

17 downstream systems for any of the types of reasons we've

18 talked about, how does that reject -- how and to whom

19 does that reject get communicated back?

20 A.   It goes to a center known as the TRECC, and that's

21 stands for trouble resolution -- excuse me, it's TRECC,

22 trouble resolution and error correction center.

23   And that's a center wotj BellSouth service

24 representatives that would perform the same kind of

1   trouble resolution and error correction that would be

2   done in the LCSC for the CLPs.

3   Q.   And that reject comes back and -- and pops up on

4   the screen of some service representative that says here

5   is an Order with the problem -- you know -- solve it?

6   A.   Actually, no, it dumps out to a printer every

7   night, and they pick up the list from the printer in the

8   morning and go into the system and try to -- try to

9   figure out what needs to be done.

10   Q.   Now, I'm going to ask you to define another term,

11   jeopardy -- in fact, let me define jeopardy and ask you

12   if I've got it right.

13   Is a jeopardy a situation where there has been

14   a committed due date, a date by which something was

15   going to be done and then for some reason it either

16   doesn't get done on that date, or it becomes obvious

17   that it won't be done on that date?

18   A.   Yes, that's -- that's a general meaning.

19   Q.   Okay. And I believe in the telephone world there

20   are probably two kinds of jeopardies. One kind is a --

21   there may be more than two. I have learned about two of

22   them. There is a -- what you would call a facilities

23   jeopardy, and there is what you would call a customer

24   caused jeopardy. Do those phrases have some meaning to

NORTH CAROLINA UTILITIES COMMISSION